

EXHIBIT 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GEORGE S. MAY INTERNATIONAL)
COMPANY,)
Plaintiff,)
v.) Case No. 04 C 6018
XCENTRIC VENTURES, LLC, *et al.*,) Honorable Judge Norgle
Defendants.) Magistrate Judge Mason

**DECLARATION OF MARIA CRIMI SPETH
IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

MARIA CRIMI SPETH states the following:

1. My name is Maria Crimi Speth. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court I could and would truthfully testify to the following information based upon my own personal knowledge.
2. I am an attorney licensed to practice law in the State of Arizona, I am an active member in good standing of the State Bar of Arizona, I have been admitted to practice law continuously in this state for the past 18 years, and I am admitted to practice *Pro Hac Vice* in this matter on behalf of Defendants XCENTRIC VENTURES, L.L.C. and ED MAGEDSON (“Xcentric”).
3. I am currently employed as a partner in the law firm of Jaburg & Wilk P.C. in Phoenix, Arizona, and I have represented Defendants in connection with this matter since its inception. I have possession of Defendants’ files in this matter, and I am personally familiar with the contents of the file.

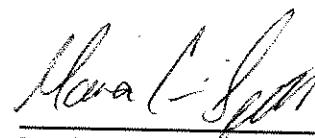
4. During the course of this lawsuit, on behalf of Defendants I requested that Plaintiff GEORGE S. MAY INTERNATIONAL COMPANY ("GSMIC") produce copies of any/all documents showing the "false and deceptively misleading statements" at issue in this case.

5. In response to that request, GSMIC produced ninety seven (97) pages of documents, all of which were printouts of pages from the Rip-Off Report website, bearing Bates Nos. GSMIC 0001—0097 which are attached to the Declaration of Ed Magedson as Exhibit A.

6. Other than these documents and the statements contained therein, I am not aware of any other specific statements about GSMIC that GSMIC has claimed are false and has accused Defendants of publishing about it.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 19, 2006.



Maria Crimi Speth

EXHIBIT 3

AFFIDAVIT OF KIM JORDAN

2 KIM JORDAN being first duly sworn upon her oath hereby deposes and says:

3 1. My name is Kim Jordan. I am a resident of the State of ~~Arizona~~^{New Mexico}, am over
4 the age of 18 years, and if called to testify in court in this matter I could and would
5 truthfully testify to the following facts based upon my own personal knowledge.

6 2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric")
7 as a content monitor. I have worked in this position since the Spring of 2006.

8 3. In my job as a content monitor, I am responsible for reviewing new postings
9 that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

10 4. My job is to remove the following information from new postings: personal
11 financial information, credit card numbers, bank account numbers, social security
12 numbers, obscenities, and threats of violence.

13 5. Except as described in the previous paragraph, I am not permitted to, nor do
14 I, change or add any content to (1) any posting; (2) any title or heading of any posting;
15 and/or (3) any other part of the Rip-off Report website.

16 6. I am aware that George S. May International Company has filed a lawsuit
17 against Xcentric and others in which it has been alleged that Xcentric created or authored
18 those certain reports which are attached to the affidavit of ED MAGEDSON as Exhibit A
19 bearing Bates Nos. GSMIC 0001—0097.

20 7. I have personally reviewed these reports and I know that I did not create
21 them or any part of them, nor do I have any information that such reports may have been
22 created by another employee or agent of Xcentric.

23 **WITNESSETH** I have read the foregoing Affidavit and I declare under penalty of perjury
24 that the facts stated therein are true and correct as of the date this Affidavit was sworn.

26 DATED: 12-14-06


KIM JORDAN

STATE OF NEW MEXICO)
) ss.
COUNTY OF McKINLEY)

Subscribed and sworn to before me this 14 day of December, 2006, by Kimberly G. Jordan, a/k/a Kim Jordan.

Marina R. Rojales
Notary Public

My commission expires:

1/15/2009

EXHIBIT 4

AFFIDAVIT OF PAULETTE GRIFFITH

PAULETTE GRIFFITH being first duly sworn upon her oath hereby deposes and says:

1. My name is Paulette Griffith. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since the Spring of 2006.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as Exhibit A bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

WITNESSETH I have read the foregoing Affidavit and I declare under penalty of perjury
that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12-19-2006

Paulette K. Griffith
PAULETTE GRIFFITH

EXHIBIT 5

AFFIDAVIT OF AMY THOMPSON

AMY THOMPSON being first duly sworn upon her oath hereby deposes and says:

1. My name is Amy Thompson. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since the spring of 2005.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as Exhibit A bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

WITNESSETH I have read the foregoing Affidavit and I declare under penalty of perjury that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12/14/2006

Amy Thompson
AMY THOMPSON

EXHIBIT 6

AFFIDAVIT OF HEATHER DORTON

2 HEATHER DORTON being first duly sworn upon her oath hereby deposes and says;

3 1. My name is Heather Dorton. I am a resident of the State of Arizona, am
4 over the age of 18 years, and if called to testify in court in this matter I could and would
5 truthfully testify to the following facts based upon my own personal knowledge.

6 2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric")
7 as a content monitor. I have worked in this position since the fall of 2004.

8 3. In my job as a content monitor, I am responsible for reviewing new postings
9 that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

10 4. My job is to remove the following information from new postings: personal
11 financial information, credit card numbers, bank account numbers, social security
12 numbers, obscenities, and threats of violence.

13 5. Except as described in the previous paragraph, I am not permitted to, nor do
14 I, change or add any content to (1) any posting; (2) any title or heading of any posting;
15 and/or (3) any other part of the Rip-off Report website.

16 6. I am aware that George S. May International Company has filed a lawsuit
17 against Xcentric and others in which it has been alleged that Xcentric created or authored
18 those certain reports which are attached to the affidavit of ED MAGEDSON as Exhibit A
19 bearing Bates Nos. GSMIC 0001—0097.

20 7. I have personally reviewed these reports and I know that I did not create
21 them or any part of them, nor do I have any information that such reports may have been
22 created by another employee or agent of Xcentric.

23 **WITNESSETH** I have read the foregoing Affidavit and I declare under penalty of perjury
24 that the facts stated therein are true and correct as of the date this Affidavit was sworn.

26 DATED: Dec. 14, 2006


HEATHER DORTON

EXHIBIT 7

AFFIDAVIT OF JACKIE WYNNE

JACKIE WYNNE being first duly sworn upon her oath hereby deposes and says:

1. My name is Jackie Wynne. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since the summer of 2004.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as Exhibit A bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

WITNESSETH I have read the foregoing Affidavit and I declare under penalty of perjury that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12-15-06

JACKIE WYNNE

EXHIBIT 8

AFFIDAVIT OF G. YOUNG

G. YOUNG being first duly sworn upon her oath hereby deposes and says:

1. My name is G. Young. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since the summer of 2003.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as Exhibit A bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

WITNESSETH I have read the foregoing Affidavit and I declare under penalty of perjury
that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12-14-06

G. Young